REMARKS

The present communication is responsive to the Official Action dated August 25, 2005, finally rejecting claims 1, 3-11, and 13-20, *i.e.*, all the claims pending in the application. Of the pending claims, claims 1 and 11 are independent. All the other pending claims depend from either claim 1 or claim 11.

In the Official Action, the Examiner responded to applicants' arguments set forth in the amendment filed on May 10, 2005, and re-asserted verbatim the rejections set forth in the Official Action dated February 10, 2005.

In responding to applicants' arguments, the "Examiner agrees, that the 'node unique ID' [is] assigned by the manufacturer, but contends that the teachings of Fujimora [sic] still reads on the claimed features." (Official Action 2, Aug. 25, 2005.) Specifically, the Examiner asserts:

> First of all, examiner points out that the claim merely recites that the "register . . . for allocating node ID number". Claim 1 does not require that the register makes the initial allocation or assignment of the ID number. Thus even though the 'node unique ID' is allocated or assigned to a device by the manufacturer, once installed at a terminal, the 'node unique ID' is also allocated in the node information table by the NIM 9. Fujimora [sic] discloses that the node information table stores (i.e., allocates) the correspondence between the node IDs and the 'node unique ID', col. 24, lines 47-60.

> Applicant specifically argues on page 8 that even though Fujimori maintains a 64 bit node unique ID, that since that value is defined in advance by a maker of a node device, that the value is not allocated as is claimed in claim 1. Again, as pointed out by Examiner, the node information table in just-in-focus stores the correspondence between the node IDs and "node unique ID," which reads on the claimed allocating.

(*Id.* 2-3.)

Applicants respectfully traverse the Examiner's response. In particular, claim 1 does more than "merely" recite a "register . . . for allocating node ID number." Claim 1 further recites "a register for selecting a predetermined number of devices from among a plurality of digital signal processing

devices connected to said digital interface." In addition, the register is also for "allocating node identification numbers to said selected devices." Thus, although claim 1 does not recite that the register makes an "initial allocation or assignment of the ID number," as stated by the Examiner, it does recite that the register selects a predetermined number of devices and allocates "node identification numbers to said selected devices."

With regard to the Examiner's statement that "the 'node unique ID' is also allocated in the node information table by the NIM 9," applicants respectfully disagree. Applicants respectfully submit that even though Fujimori discloses that "the node information table stores . . . [a] correspondence between the node IDs and the node unique ID," that disclosure is distinguishable from the claims and does not support the Examiner's rejection. (Fujimori col.24 ll.47-56.) First, the plain meaning of the word allocate is distribute or designate. *Merriam Webster's Collegiate Dictionary* (10th ed.) In addition, Fujimori explicitly defines a node ID as an "ID dynamically allocated to each node upon the bus initialization" or reset. (*Id.* col.24 ll.56-57; col.8 ll.33-35, 38-41.) Thus, not only does Fujimori teach that a node ID is "dynamically allocated," but Fujimori further makes it clear that allocating and storing are two different processes. Applicants respectfully submit that the Examiner should not equate storing with allocating. Indeed, Fujimori counsels otherwise. Thus, even though Fujimori discloses that NIM 9 stores a correspondence between the node IDs and the node unique ID, storing such information is different than allocating a node ID as the Examiner asserts.

Furthermore, claim 1 recites that the register is for "allocating node identification numbers and . . . storing a record of said node identification number allocated to said selected device." Thus, storing and allocating are used differently in claim 1. Therefore, the Examiner's assertion that storing and allocating are one in the same is incorrect based on the plain meaning of the words, Fujimori and the claims.

With regard to the Examiner's rejection under 35 U.S.C. § 103 based on Yoshino further in view of Fujimori, applicants respectfully traverse the Examiner's rejection.

In particular, applicants respectfully submit that Fujimori does not make up for the deficiency in *Yoshino* because, in addition to reasons discussed above, Fujimori does not teach or suggest "maintaining said record regardless of whether said selected device remains connected to said digital interface," as is recited in claim 1. In fact, Fujimori teaches opposite to this limitation. Fujimori clearly states that "A unique node ID is automatically allocated to each node upon the bus reset." (Fujimori col.8 11.33-35.) Although confusing, it is clear from Fujimori that the terms "unique node ID" and "Node ID" are used interchangeably. In that regard, Fujimori clearly defines "Node ID" to mean: "An ID dynamically allocated to each node upon the bus initialization." (*Id.* col.24 11.56-57.) In fact, Fujimori's definition of a unique Node ID is included in the very portion of Fujimori on which the Examiner relies in supporting this rejection.

Indeed, Fujimori is clear in teaching that node identification numbers or node IDs are dynamically allocated on the bus. (*Id.* col.24 11.56-57.) Fujimori further states that "[t]hus, the node ID and the channel number used for addressing are reallocated upon the bus reset." (*Id.* col.8 11.38-40.) Thus, even though by Fujimori's teaching, the node unique ID is assigned by the manufacture, the node ID changes each and every time there is a bus reset or initialization.

In contrast, claim 1 is directed to an apparatus that comprises "a register for . . . allocating node identification numbers to said selected devices, for each of said selected devices, said register storing a record of said node identification number allocated to said selected device and maintaining said record regardless of whether said selected device remains connected to said digital interface." Thus,

unlike Fujimori, the apparatus of claim 1 comprises a register for allocating node identification numbers to the selected devices and maintaining a record of the identification numbers "regardless of whether said selected device remains connected to said digital interface." Indeed, Fujimori teaches the opposite operation.

Inasmuch as claim 11 recites "said registering step including allocating a node identification number to each of said selected devices and, for each of said selected devices, storing a record of said node identification number for said selected device regardless of whether said selected device has been connected to the digital interface," applicants respectfully submit that claim 11 is also not rendered obvious by the combination of *Yoshino* and Fujimori for at least the reasons provided above.

Further in this regard, as all the other claims pending in the application depend from either claim 1 or 11, applicants also respectfully submit that these claims are also not anticipated or rendered obvious for at least the foregoing reasons.

If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he/she telephone applicant's attorney at (908) 654-5000 in order to overcome any additional objections which he might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

Dated: November 25, 2005   Respectfully submitted,

By _____
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